

December 19, 2018

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90;
Connect America Phase II Challenge Process, WC Docket No. 14-93 –
Alaska Communications CAF II-Qualifying Locations

Dear Ms. Dortch:

On behalf of Alaska Communications Systems Group, Inc. (“Alaska Communications”), enclosed is a description of four census blocks in Alaska Communications’ price cap local exchange service territories (ACS of Anchorage, ACS of Fairbanks, and ACS of the Northland) which meet the definition of high-cost under the Connect America Model (“CAM”). These four census blocks were shown as “cable served” in CAM version 4.2, Node 4 Working Customer Report, but December 2017 FCC Form 477 filings indicate that, in fact, they are “unserved” by an unsubsidized competitor with broadband at speeds of at least 10 Mbps downstream and 1 Mbps upstream.¹ Therefore, they qualify for high-cost support under the Commission’s Connect America Fund (“CAF”) Phase II parameters for Alaska Communications.

Please direct any questions concerning this matter to me.

Respectfully submitted,



Karen Brinkmann
Counsel to Alaska Communications

Attachment: Excel Spreadsheet
cc: Alex Minard
Talmage Cox
Dangkhwa Nguyen

¹ *Connect America Fund*, WC Docket No. 10-90, Order, 31 FCC Rcd 12086 (2016).

Alaska Communciations - High Cost Census Blocks not included in the Funded HC, EHC or LC Census Block List

4 census blocks with Subscriber Costs over 52.50 in CAM 4.2 model

FCC Form 477 data as of Dec 2017 shows all census blocks unserved by GCI

Benchmarks for the CAM v4.2 - Low cost is <\$52.50, High cost is >=\$52.50 and <=\$209.32, Extremely High cost is >\$209.32

ACS Community	Census Block	Name	4.2 Estimated \$Sub	4.2 CB Category	Total	Census Block Served by GCI (477 Dec 2017)
ANCHORAGE	020200025022012	ACS of Anchorage	\$ 55.00	HC	31	NO
ANCHORAGE	020200027023004	ACS of Anchorage	\$ 75.00	HC	11	NO
FAIRBANKS	020900013001010	ACS of Fairbanks	\$ 80.00	HC	8	NO
KENAI	021220006002006	ACS of Northland - Glacier State	\$ 75.00	HC	7	NO
					57	

Not included in the HC list provided by Bureau because CB is shown as “cable served” in CAM 4.2 Node 4 Working Customer Report

CAM V4.2 estimated cost from files SS20141208CAM_4_2_CBSummary_Node4WorkingCust files found on CAM website